

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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**AMY J. WALTERS**

Plaintiff,

vs.

Case No. 12-CV 804

**MAYO CLINIC HEALTH SYSTEM-  
EAU CLAIRE HOSPITAL, INC.**

Defendant.

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**NOTICE OF MOTION AND MOTION IN LIMINE**

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TO: Mayo Clinic Health System- Eau Claire Hospital, Inc.  
c/o Attorneys Mike Modl and Michael J. Westcott  
Axley Brynelson, LLP  
2 East Mifflin St. Ste. 200  
Madison, WI 53703

PLEASE TAKE NOTICE that Plaintiff, Amy J. Walters, by her attorneys Skinner and Associates and Bakke Norman, S.C. by Carol N. Skinner, hereby moves the Court for an Order limiting the following evidence from being introduced by Defendant at trial in this matter:

1. Evidence or argument relating to Plaintiff's marriage to her co-worker, Bill Parsons, including any information about their decision to get married, their marital relationship and their divorce. Plaintiff's marriage to Mr. Parsons does not have any tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without this evidence, and is thus not relevant evidence as defined in Fed. R. Evid. 401. Even if such evidence were relevant, this evidence should be excluded

because its probative value is substantially outweighed by the danger of unfair prejudice and confusion of the issues, pursuant to Fed. R. Evid. 403.

2. Evidence or argument relating to Plaintiff's personal relationship with her co-worker Dr. Eduardo Perez. The grounds for this motion are the same grounds as those identified in paragraph 1.

3. Evidence or argument relating to Plaintiff's receipt of social security benefits pursuant to the collateral source rule, as well as Fed. R. Evid. 401 and 403.

4. Evidence or argument regarding Plaintiff's alleged illicit drug use. The grounds for this motion are the same grounds as those identified in paragraph 1.

5. Comments contained in Dr. Bartell's expert report which do not comply with Fed. R. Civ. P. 702.

6. Evidence or argument regarding conduct by Plaintiff's psychiatrist. The grounds for this motion are the same grounds as those identified in paragraph 1.

Dated February 21, 2014.

**SKINNER AND ASSOCIATES**



By: \_\_\_\_\_

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